

June 18, 2009

Mr. Allen Norfleet
Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E Street NW
Washington DC 20463

Identification Number: C00449280

Dear Mr. Norfleet:

This letter responds to your letter dated June 3, 2009, regarding the Amended September Monthly Report (8/1/08-8/31/08), which Free and Strong America PAC, Inc. filed on October 20, 2008.

Our answers to your inquiries are as follows:

1. Free and Strong America PAC, Inc. is familiar with the rules governing goods and/or services provided by one committee to another. See 11 CFR s. 100.52(d)(1). As such, all payments for purchases and rentals are equal to the fair market value and the "usual and normal charge" for such goods and services. To determine the amounts charged to the committee for purchases and rentals from other committees, Free and Strong America PAC, Inc. consults with merchants, distributors, and vendors to determine the current market pricing for the goods or services in question. For instance, to calculate the value of donor lists and related assets, political list vendors and merchants specializing in the relevant goods were consulted. To calculate the value of equipment purchases, merchants specializing in such goods were consulted. We are confident that this process led us to paying the "usual and normal charge" for all goods and services purchased from other committees.

2. As you correctly note, on several occasions Free and Strong America PAC, Inc. made expenditures for "Printing," "Postage," and "Postage/Printing," "Printing/Postage," and "Direct mail creative fee[s]."

These expenditures included the following items:

- The printing of blank letterhead and labels for the PAC.
- The printing and mailing of PAC thank you notes that did not contain express advocacy as defined under 11 CFR s. 100.22 or mention Federal candidates.
- The printing and mailing of PAC fundraising solicitations that did not contain express advocacy as defined under 11 CFR s. 100.22 or mention Federal candidates.
- Direct mail creative fees related to the creation of a PAC fundraising solicitations that did not contain express advocacy as defined under 11 CFR s. 100.22 or mention Federal candidates.

Thank you for your assistance on these matters. Please do not hesitate to contact us if you have any questions.

Sincerely,

Darrell Crate
